

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BANCO POPULAR DOMINICANO, C. Por A.

Plaintiff and Counterclaim Defendant,

vs.

LEVI STRAUSS & CO.,

Defendant and Third Party Plaintiff,

vs.

**INTERAMERICANA APPAREL COMPANY, INC.;
INTERAMERICANA PRODUCTS
INTERNATIONAL, S.A.; QST DOMINICANA
LLC; US PAPER & CHEMICAL; APPAREL
MACHINERY & SUPPLY CO.; YKK SNAP
FASTENERS AMERICA, INC.; SOUTHERN
TEXTILE DOMINICANA, INC; INDUSTRIA
CARTONERA DOMINICANA, S.A. (Smurfit);
THE GRAPHIC LABEL GROUP DOMINICANA,
INC.; and TAG-IT PACIFIC, INC.,**

Third-Party Defendants.

07 Civ. 6443 (LTS)(THK)

**THIRD PARTY DEFENDANT
QST DOMINICANA LLC'S
REPLY TO THIRD PARTY
DEFENDANT PRECISION
CUSTOM COATING, LLC'S
CROSS-CLAIM**

Third party defendant QST Dominicana, LLC ("QST"), by its attorneys, Vedder Price, P.C., hereby files its Reply and defenses to the Answer to Third Party Complaint with Cross-claim and Counterclaim ("Answer and Crossclaim") of Precision Custom Coating, LLC (appearing for and on behalf of third party defendant Southern Textile Dominicana, Inc.)(("Precision"), and states as follows:

REPLY

1. Paragraphs 1 through 24 of Precision's Answer and Crossclaim constitute Precision's answer and require no response herein.

2. QST has insufficient knowledge or information to form a belief as to the allegations in paragraph 25 of the Answer and Crossclaim.

3. QST has insufficient knowledge or information to form a belief as to the allegations in paragraph 26 of the Answer and Crossclaim.

4. QST has insufficient knowledge or information to form a belief as to the allegations in paragraph 27 of the Answer and Crossclaim.

5. QST has insufficient knowledge or information to form a belief as to the allegations in paragraph 28 of the Answer and Crossclaim.

6. QST has insufficient knowledge or information to form a belief as to the allegations in paragraph 29 of the Answer and Crossclaim.

7. QST has insufficient knowledge or information to form a belief as to the allegations in paragraph 30 of the Answer and Crossclaim.

8. QST has insufficient knowledge or information to form a belief as to the allegations in paragraph 31 of the Answer and Crossclaim.

9. QST denies the allegations in (first) paragraph 32 of the Answer and Crossclaim.

10. QST has insufficient knowledge or information to form a belief as to the allegations in (second) paragraph 32 of the Answer and Crossclaim.

11. QST has insufficient knowledge or information to form a belief as to the allegations in (third) paragraph 32 of the Answer and Crossclaim.

12. QST has insufficient knowledge or information to form a belief as to the allegations in paragraph 33 of the Answer and Crossclaim.

13. QST has insufficient knowledge or information to form a belief as to the allegations in paragraph 34 of the Answer and Crossclaim.

14. QST has insufficient knowledge or information to form a belief as to the allegations in paragraph 35 of the Answer and Crossclaim.

FIRST DEFENSE

QST's claim to the stake is superior to the rights of any other party to this lawsuit.

Dated: New York, New York
January 15, 2008

Michael M. Eidelman, Esq.
Randy M. Lending, Esq.
VEDDER PRICE, P.C.
222 North LaSalle Street
Chicago, Illinois 60601
(312) 609-7500

Respectfully submitted,

VEDDER PRICE, P.C.

By: 
Charles Caranicas (CC 9244)

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Attorneys for Third Party Defendant
QST Dominicana LLC

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Third-Party Defendants.

AFFIDAVIT OF SERVICE

**STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)**

CHARLES S. CARANICAS, being duly sworn, hereby deposes and says as follows:

1. I am not a party to this action, am over eighteen years of age, and reside in Brooklyn, New York.

2. On January 15, 2008, I caused the within **THIRD PARTY DEFENDANT QST DOMINICANA, LLC's REPLY TO THIRD PARTY DEFENDANT PRECISION CUSTON COATING, LLC's CROSS-CLAIM** to be served on all parties that have appeared in this action by dispatching true copies of same, enclosed in a properly addressed wrapper, for delivery by regular mail, to the following addresses:

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Interamericana Products Int'nat'l, S.A.*

Sworn to and subscribed before me on
this 15 day of January, 2008


Notary Public


Charles S. Caranicas

NANCY J. NEUBAUER
Notary Public, State of New York
No. 01NE5041602
Qualified in New York County
Commission Expires April 10, 2011